

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CHARLES SALDARRIAGA,

Plaintiff,

-against-

**DECLARATION OF
MICHAEL FUTRAL**

25-CV-1115 (RPK) (JRC)

THE CITY OF NEW YORK, NEW YORK CITY POLICE
DEPARTMENT, SERGEANT DET. WILLIAM J.
PLANETA, DET. ERIC BOLGER, DET. LEONARDO
MOSCOSO, and OFFICER MOHAMMAD F. HOSSAIN,

Defendants.

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I, **MICHAEL FUTRAL**, an attorney duly admitted to practice in the Eastern District of New York, declare pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendants City of New York, Sergeant Det. William J. Planeta, Det. Eric Bolger, and Det. Leonardo Moscoso (“Defendants”) in the above captioned case. As such, I am familiar with the facts and circumstances of this action. I make this declaration in support of Defendants’ motion to dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. In support of their motion, Defendants submit the exhibits described below:

2. Annexed hereto as Exhibit “A” is a true and correct copy of the Criminal Complaint.¹

¹ To protect privacy, Personal Identifiable Information (“PII”) has been redacted.

3. Annexed hereto as Exhibit “B” is a true and correct copy of Plaintiff’s Notice of Claim.²

4. Annexed hereto as Exhibit “C” is a true and correct copy of Plaintiff’s 50-h Hearing Transcript.³

Dated: New York, New York
September 4, 2025

MURIEL GOODE-TRUFANT
Corporation Counsel of the City of New York
*Attorney for Defendants City of New York, Planeta,
Bolger, and Moscoso*
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By: Michael Futral /s/
Michael Futral, Esq.
Assistant Corporation Counsel
Special Federal Litigation

Cc: Charles Saldarriaga (*First Class Mail*)
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Pro se Plaintiff

² To protect privacy, Plaintiff’s PII has been redacted.

³ To protect privacy, Plaintiff’s PII has been redacted.